Allied Site Task Force

Kalamazoo River Watershed Council City of Kalamazoo Kalamazoo Regional Chamber of Commerce Heritage Hills Neighborhood Association Kalamazoo River Cleanup Coalition Kalamazoo County ISAAC Interfaith Strategies

Great Lakes Environmental and Molecular Sciences Center

October 29, 2007

Mr. Michael Berkoff USEPA REGION 5 SRF-6J 77 West Jackson Boulevard Chicago, IL 60604-3507

Dear Mr. Berkoff;

US EPA RECORDS CENTER REGION 5

Thank you for your recent invitation to meet on November 6th to discuss the Allied Site RI/FS. The Allied Site Task Force (ASTF) is made up of representatives from several local units of government, NGOs, and neighborhood groups. Our primary purpose is to create an on-going dialogue involving representatives from our community, EPA, and the PRPs. We want to return the Allied Site blighted area to a state that is not only protective of human and ecosystem health but also is a viable piece of the Portage Creek Corridor which is targeted for extensive, linear economic development and revitalization. We also recognize that the Allied Site and Portage Creek Corridor are a part of the larger Superfund Site which is due equal, long-term consideration for resource recovery, conservation, and development.

We are aware of the traditional status of citizen groups regarding the level of involvement in the Remedial Investigation (RI) and the subsequent Feasibility Study (FS), and would like you to reconsider this sequence to enable us to be contributors and joint participants throughout both the RI and FS processes. We desire to become compatriots sharing concerns and goals. For instance, we would like to see the Allied Site returned to a state that does not require warning signs or fencing. We want to be able to answer our fellow citizens' questions about the site with an affirmation of our faith in our government agencies' diligence in protecting its citizens. We have heard the people's desire to return the Allied Site and adjacent properties, in the Portage Creek Corridor, to a healthy state supportive of mixed-use development of greenways with recreational space, bike trails, residences, and shops. This would integrate the Allied Site into existing nearby neighborhood revitalization concepts.

In a June 1, 2007 response letter from Mr. Steven Chester, Director of the Michigan Department of Environmental Quality, to the City of Kalamazoo, Mr. Chester proposed a working meeting prior to the RI becoming public. This suggestion was well-received by Kalamazoo residents, but we have not been advised of any scheduled follow up meeting.

We would appreciate meeting also with the Potentially Responsible Parties (PRPs) as we feel that the remedial action requires an innovative and lasting solution for the Allied Site. We all need to understand the technical rationale for PCB-contaminated paper mill waste remaining on-site due

to an arbitrary demonstration of equivalency of that waste to a fully permitted TSCA landfill. Also we would like to hear a response to concerns expressed by our Public Services Director, Bruce Merchant, regarding the impact of the site being within the five year time of travel capture zone for the city's major well field supplying water for much of Kalamazoo County.

Considering the disposition and varying degrees of PCB concentration in the Allied Site or OU-1, we are naturally concerned, as we assume you are as well, for the safest remediation of existent PCBs for human and ecosystem health. We also share concerns about possible migration of PCB laden residuals from the site as well as Portage Creek embankment contamination.

Again, we realize that traditionally there is little opportunity for concerned parties to participate until the RI and FS are done. However, our grandparents traditionally used iceboxes though we prefer electric refrigerators. Innovation is often a risk but is frequently well-rewarded. We appeal to you to allow our participation. Let this be an efficacious partnership from this point forward.

We look forward to creating an effective collaboration with all stakeholders in determining the best outcome for the Allied Site.

Sincerely,

Jeffrey A. Spoelstra

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Coordinator/Facilitator

Kalamazoo River Watershed Council On behalf of the Allied Site Task Force

cc:

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